

1
2
3
4
5 IN THE UNITED STATES DISTRICT COURT
6 FOR THE NORTHERN DISTRICT OF CALIFORNIA
7

8 IN RE: UBER TECHNOLOGIES, INC.,
9 PASSENGER SEXUAL ASSAULT
10 LITIGATION

11 This Document Relates to:
12 ALL CASES
13

Case No. 23-md-03084-CRB

**AFFIDAVIT OF TIFFANY R. ELLIS IN
SUPPORT OF PLAINTIFFS' LIST OF
DISPUTED ENTRIES FOR SPECIAL
MASTER REVIEW**

Judge: Honorable Barbara S. Jones

1 I, Tiffany R. Ellis, hereby declare as follows:

2 1. I am a partner of Peiffer Wolf Care Kane Conway & Wise, an attorney licensed in
3 the States of Michigan and Illinois and duly admitted to practice before this Court, representing
4 Plaintiffs in the above caption action.

5 2. I submit this declaration in support of Plaintiffs' List of Disputed Entries from
6 Defendants' May 27, 2025 Privilege Log that was submitted for Master Review on June 12,
7 2025.

8 3. Plaintiffs incorporate the Discovery Letter Brief Regarding Disputed Entries for
9 Master Review filed by All Plaintiffs on March 4, 2025. *See* ECF No. 2434. Plaintiffs
10 incorporate the brief to support the specific reasons each entry on Plaintiffs' List of Disputed
11 Entries from Defendants' May 27, 2025 Privilege Log was challenged. The Brief included the
12 general background of the privilege dispute process to date, the legal standard for Plaintiffs
13 raising challenges to Defendants' privilege log entries, and a general argument for the challenges
14 Plaintiffs raised.

15 **Uber's May 27, 2025 Privilege Log**

16 4. On May 27, 2025, Defendants provided a privilege log containing 7,298 new
17 entries.

18 5. On June 3, 2025, Plaintiffs provided the Defendants with a list of 439 disputed
19 entries from Defendants' May 27, 2025 privilege log. The list included entries Plaintiffs
20 challenged outright or identified as lacking sufficient information to assess the privilege claim.

21 6. The Parties meet and conferred on June 10, 2025 regarding the disputed entries.

22 7. On June 12, 2025, the Plaintiffs provided a list of 396 entries remaining in dispute
23 to the Master and Defendants.

24 Executed this 16th day of June 2025 in Detroit, Michigan.

25
26 /s/ Tiffany R. Ellis
Tiffany R. Ellis